

RODNEY J. JACOB, ESQ.
DANIEL M. BENJAMIN, ESQ.
JENNIFER A. CALVO-QUITUGUA, ESQ.
CALVO & CLARK, LLP

Attorneys at Law
655 South Marine Corps Drive, Suite 202
Tamuning, Guam 96913
Telephone: (671) 646-9355
Facsimile: (671) 646-9403

CHRISTOPHER E. CHALSEN, ESQ.
MICHAEL M. MURRAY, ESQ.
LAWRENCE T. KASS, ESQ.
MILBANK, TWEED, HADLEY & MCCLOY LLP

1 Chase Manhattan Plaza
New York, New York 10005
Telephone: (212) 530-5000
Facsimile: (212) 822-5796

Attorneys for Defendants
FUJITSU LIMITED, and
FUJITSU MICROELECTRONICS AMERICA, INC.

FILED
DISTRICT COURT OF GUAM

MAY -1 2007

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF GUAM

NANYA TECHNOLOGY CORP. and
NANYA TECHNOLOGY CORP. U.S.A.,

Plaintiff,

vs.

FUJITSU LIMITED, FUJITSU
MICROELECTRONICS AMERICA, INC.,

Defendants.

CIVIL CASE NO. 06-CV-00025

**DEFENDANTS' MOTION TO COMPEL
IMMEDIATE SUBSTANTIVE
RESPONSES TO FMA'S
JURISDICTIONAL DISCOVERY
REQUESTS**

ORIGINAL

MOTION

Pursuant to Local Rule 37.1, Defendant Fujitsu Microelectronics America, Inc. ("FMA") hereby moves the Court to compel Plaintiffs Nanya Technology Corp. and Nanya Technology Corp. U.S.A. to immediately produce substantive responses to the following FMA jurisdictional discovery requests:

1. FMA's First Set of Interrogatories (Nos. 1-6);
2. FMA's First Set of Requests for Production (Nos. 1-29);
3. FMA's First Set of Requests for Admissions (Nos. 1-34) on Plaintiff Nanya Technology Corporation U.S.A.; and
4. FMA's First Set of Requests for Admissions (Nos. 1-34) on Plaintiff Nanya Technology Corporation.

This motion is made pursuant to Local Rule 37.1 and is based on this Motion, the accompanying stipulation, all pleadings and other documents filed in this case, and any matters upon which the Court may take judicial notice.

Respectfully submitted this 30th day of April, 2007.

CALVO & CLARK, LLP
MILBANK, TWEED, HADLEY
& MCCLOY LLP
Attorneys for Defendants
Fujitsu Limited and
Fujitsu Microelectronics America, Inc.

By:


JENNIFER A. CALVO-QUITUGUA